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Attorneys for Defendant Adam Shafi

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADAM SHAFI,

Defendant

NO. 15 Cr. 582 WHO

STIPULATED MOTION AND
[PROPOSED] ORDER TO CONTINUE
ORAL ARGUMENT

The parties stipulate that oral argument on the motion for reconsideration of detention [Dkt. #49] be continued from February 18, 2016 at 1:30 p.m. to February 25, 2016 at 1:30 p.m. The parties agree that this stipulated motion to continue oral argument may be granted based on this stipulated motion and the declaration of counsel below, and without oral argument.

STIPULATED MOTION
TO CONTINUE ORAL ARGUMENT
CR 15-0582 WHO

Declaration of Counsel

1. Along with Joshua L. Dratel, I represent Mr. Adam Shafi in the above-captioned matter and I submit this declaration based on information and belief.

2. Mr. Shafi's motion for reconsideration of detention order is scheduled for oral argument on the Court's February 18, 2016, calendar.

3. An unforeseen health emergency prevents counsel from attending oral argument.

4. The parties have agreed to continue oral argument until the Court's February 25, 2016, calendar.

5. While Alameda County Counsel is available on those dates as well, Lieutenant Dan Brodie (who also planned to attend) is not available on February 25, 2016.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 17th day of February, 2016, at Berkeley, California.

s/ Erik B. Levin

Erik B. Levin

SO STIPULATED.

DATED: 2/17/16

BRIAN STRETCH

Acting United States Attorney

s/ Jeffrey Shih

Jeffrey Shih, Esq.

Assistant United States Attorney

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:

JUDGE WILLIAM H. ORRICK

Certificate of Service

I hereby certify that on February 17, 2016, I filed the foregoing **Stipulated Motion And [Proposed] Order To Continue Oral Argument** with the Clerk of the United States District Court for the Northern District of California by using the CM/ECF system.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 17, 2016.

s/Erik B. Levin
Erik B. Levin, Esq.